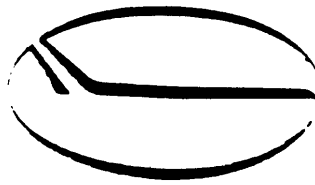


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RULES DOCKET



Air Transport Association

Docket # FAA-1999-5401-82

2000 JAN -T A 10:35

March 11, 1996; No. 96-AE-014

72069

AIRWORTHINESS ENGINEERING MEMORANDUM

ACTION: **AEC/AC** Coordination Task Force: Accomplish
action items as noted in memo.

SUBJECT: Airworthiness Concern Coordination Task Force - Summary
Minutes/Comments of February **21th** Meeting, **ATA**
Headquarters

TO: **AEC/Airworthiness** Concern Coordination **Task** Force

A summary report of the subject meeting follows:

ADMINISTRATIVE

George Slaughter (UPS), Chairman, began introductions of those in attendance (Attachment **1**). The next meeting of the Task Force is proposed for July **11, 1996** in **Renton**, Washington.

ACTION ITEM: Task Force Members: Please advise by May **15th** if the proposed July **11st** date is not acceptable for the next meeting.

1. AD APPLICABILITY NOTE AND THE NEED TO SUBMIT AN AMOC

For about a year, the FAA **ACO's** have included a note in every AD and AD **NPRM** published, that provides FAA policy on interpreting AD applicability statements. Operator task force members think the note **is** confusing and should be withdrawn. Jack **McGrath** indicated the FAA have internally discussed the use of this note and still conclude that the note **is** necessary. However he did acknowledge that "broadly" written applicability statements will result in needless **AMOC's** and indicated that the FAA AD Handbook is being revised to emphasize the importance of limiting the applicability paragraph to only those airplane configurations affected by the AD. For example, the applicability statement for an AD affecting **737** galley support structure configured to a specific weight limit should not include other **737** galleys below the specific weight limit. Operators can assist in scrutinizing proposed applicability statements by submitting

One of the recommendations of the **ARAC/AMOC** working group that was recently submitted to FAA Washington was to delegate **AMOC** approvals to the OEM **DER** for certain structural repairs. If this recommendation is incorporated into FAA policy, could service bulletin **repair** instructions include a statement that instructs what to do to **if** repair instructions are not complete? E.g. an instruction advising operators that "repairs for cracks that exceed 4 inches require OEM **DER** approval"?. Ideally all repair information should be provided within the service bulletin.

ACTION ITEM: Jack **McGrath/Tim Dulin**: Determine **FAA** obstacles in writing **AD's** that simply **describe** 'a required action such as **"inspect** and repair in accordance with service bulletin **XXX"**. Further descriptions on what to do would be provided in the referenced service bulletin.

ACTION ITEM: **AEC** Members: Review proposed **approach** in promoting compatibility between **AD's** and referenced **service** bulletins. Provide **comments** on subject to **ATA** by April **30, 1996**. **ATA** will distribute your **comments** to AC **Coord**. Task Force in preparation for next meeting with FAA **ACO**.

ACTION ITEM: **G. Slaughter, D. Lotterer, Vern Brinkman, Bob Carlson, Steve Fus** and other task force members: Develop **specific** examples for discussion at the next AC Coordination task force meeting on how AD provisions can be made more **compatible** with the referenced service bulletin.

3. USE OF SAFETY (RISK) ASSESSMENT METHODOLOGY IN DETERMINING UNSAFE CONDITIONS

This task is assigned to the **SAE** committee, **S-18** "Safety Assessment for Airborne Systems and Equipment". The chairman of this group is John Dalton of the Boeing Company (**ph:206 544-0725**)

Note: Since our **Feb 21st** meeting the **SAE** group has met and agreed to the following schedule for **1996** meetings:

May 1-3	Seattle
June 18-21	Santa Fe, NM
August 20-23	Berlin, Germany
October 15-18	Bar Harbour , Maine
December 10-13	San Francisco, CA

ACTION ITEM: George Slaughter/Dave **Lotterer**: Solicit **AEC** representation for **this SAE committee**.

4. ADOPTION OF GENERIC LETTER CHECKS FOR AD COMPLIANCE PERIODS.

The proposed compliance periods for a number of **ADs** are

based on and supported by risk assessment. For example crack propagation analysis would determine an appropriate compliance periods for most structure **ADs**. However for many **AD's**, the **proposed Compliance** period is largely **determined** by simply **reviewing** availability of parts and selecting a period that **considers** the manhours to do the required inspection/modification. **AD's** which propose a **6** or **12** month compliance period are typical. Operator-request to extend compliance periods to avoid unscheduled maintenance costs are generally rejected by the **FAA-ACO**.

The task force therefore recommends that a **"C"** check compliance period (**18** months) or **"D"** check period (**5** years) be adopted for all rules unless it can be shown that a shorter time interval is required for safety reasons.

ACTION ITEM: Task Force **Members**: Develop further examples/materials of generic (**18 mo/5 yr**) compliance periods for additional discussion with FAA on appropriateness of **18 mo/5 yr** compliance period.

5. IMPROVING THE LEAD AIRLINE PROCESS

The "lead airline" process has been extended to most **ADs** (ref: **AEM No. 95-AE-024**). The original lead airline process focused primarily on airworthiness concerns brought to the attention of the **ATA** members by the manufacturer; **ATA** staff extended the process to other airworthiness concerns when notified by the FAA (during the information gathering stage of **rulemaking**) of a pending AD (see attached draft **AC-92**, dated March **21, 1996**).

The task force members agreed that a number of shortcomings could be overcome if more people were aware of the lead airline process and what is expected of its participants.

ACTION ITEM: **G. Slaughter, D. Lotterer, Vern Brinkman, Bob Carlson, Steve Fus**: Review draft **revision** of AC Report **92** and develop a draft training program for reintroducing the lead airline **process** among the **FAA-ACO's**.

ACTION ITEM: **AEC members**, particularly **"lead airline"** contacts: **Review** and **provide comments for change** on **draft AC 92** to **ATA** by April **30, 1996**; **Update** lead airline **contacts lists** (attachments to draft AC 92)

6. COST BENEFIT ANALYSIS FOR ADS

The supplementary **comments** of high cost **AD's** now contain a "boilerplate" paragraph to indicate the FAA position on why a full cost-benefit analysis has not been **accomplished** (or needed). Airline Task Force **member** thought that the boilerplate discourages the submittal of any meaningful comments on the **cost**